

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MAXIM CRUDE OIL, LLC
PLAINTIFF,

v.

NOIL CORP., INC. AND MORRELL
STEVE NEELY

DEFENDANTS.

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CIVIL CAUSE 2:21-CV-00090

THIRD STATUS REPORT

TO THE HONORABLE DAVID S. MORALES, UNITED STATES DISTRICT JUDGE:

Pursuant to the February 1, 2024 status conference Plaintiff, Maxim Crude Oil, LLC (“Maxim”) hereby submits its Status Report and respectfully state as follows:

1. At the status conference the Court advised the parties to work towards a proposal to get the remainder of the settlement paid.

2. Counsel for Plaintiff has reached out to opposing counsel on February 2, 2024 and was told that they would check with their client and get back to me.

3. On February 7, 2024, counsel for Plaintiff reached out to opposing counsel again to ask if they have discussed with their client and no response was made.

4. On February 20, 2024, counsel for Plaintiff reached out to opposing counsel again and counsel for Defendants stated that their clients bank account remains frozen, but they hope to have some resolution shortly. This was the same reason that was told to Plaintiff’s counsel in December 2023.

5. During the recent status conference, counsel for Noil advised that Mr. Neely was trying to obtain a loan to pay off the settlement. When asked about that, Defendant’s counsel did

not respond on the status of the loan.

6. Counsel for Noil has not made any proposal for resolving the outstanding settlement obligations and as of the date of this third status report no further payments have been made towards the settlement.

7. Counsel for Plaintiff sent the proposed status report to counsel for Noil today and has not had any response to the same.

8. Plaintiff plans on filing its motion to enforce settlement agreement and awarding attorneys fees.

Dated: March 4, 2024

Respectfully Submitted,

/s/ Antonio Ortiz

Antonio Ortiz

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2024, a true and correct copy of the foregoing was served on the parties listed below via the court's CMECF electronic filing.

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/s/ Antonio Ortiz

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